



Dakota Rural Action

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Neil Hammerschmidt,
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Agency Docket Number: 05-015-1

Comments from Dakota Rural Action for consideration regarding the USDA National Animal Identification System (NAIS)

Dakota Rural Action (DRA) is a non-profit, grassroots, family agriculture and conservation group that organizes South Dakotans to protect our family farmers and ranchers, natural resources, and unique way of life. DRA is a member of the Western Organization of Resource Councils (WORC), which has seven state affiliates in the West. DRA and WORC have a long history of supporting family agriculture and fair, open markets. We appreciate the opportunity to comment on the proposed National Animal Identification System.

DRA is opposed to the National Animal Identification System (NAIS) for several reasons. First, we do not believe that a national animal identification program is necessary since mandatory country-of-origin labeling was enacted in the 2002 Farm Bill. DRA is a long-time supporter of mandatory country-of-origin labeling, which requires that only meat that has been born, raised and processed in the U.S. can be labeled as a U.S. product. Since the greatest risk of disease, such as bovine spongiform encephalopathy, is posed from imported cattle and meat products, we do not feel that domestic producers should have to bear the burden of a program such as the NAIS. The NAIS does nothing to prevent the introduction of BSE into the U.S. and does not provide any trace-forward capabilities, only traceback capabilities, which do not adequately protect consumers. Livestock should be permanently marked with their country of origin before entering the U.S.; and there should immediately be an investigation to identify and mark imported cattle already in the U.S.

Next, DRA believes the extra cost and burden of the NAIS to be unnecessary since cattle producers in the U.S. already have systems in place that provide for traceback. For example, the program to identify cattle vaccinated for brucellosis has existed for years, is overseen by USDA's Animal and Plant Health Inspection Service (APHIS) and is administered by state animal health boards. Furthermore, many states have a brand inspection program, which proved to be the most efficient method in locating a Canadian bull from the herd where a cow was discovered to have BSE in May 2003. The brucellosis vaccination and brand inspection programs are both existing, effective methods of traceback; the NAIS would only be an unnecessary, expensive burden on producers.

Having illustrated that there are existing programs that ensure consumer confidence, as well as protect the economic viability of domestic producers, we believe that the only purpose of the NAIS is to further integrate the U.S. cattle industry for the benefit of the meatpacking industry. The NAIS would collect proprietary information, which could be misused by meatpackers to discriminate among producers and manipulate the markets. Should a national animal identification plan be implemented, any data collected should be accessible *only* to state animal health agencies and *only* for the purpose of official disease investigation.

Finally, the NAIS could expose producers to unwarranted liability because the information collected could be used to shift blame for food contamination incidents from packers and processors back to producers. It is vital that livestock producers not be liable for claims that occur after the cattle leave the producers' control.

For these reasons, DRA is opposed to the NAIS. Thank you.

Sincerely,
Shane Kolb
DRA Livestock Team Chair
Meadow, SD 57644